

1 THE HONORABLE BARBARA J. ROTHSTEIN

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8 UNITED STATES DISTRICT COURT  
9 WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

10 IN RE Phenylpropanolamine (PPA) Products  
Liability Litigation

11 No. MDL 1407

12 This document relates to all actions

13 AMENDED  
14 NOTICE OF TAKING  
DEPOSITION DUCES TECUM  
15 OF RIC INTERNATIONAL,  
INC. PURSUANT TO  
FEDERAL RULE OF CIVIL  
PROCEDURE 30(B)(6)

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17  
18 PLEASE TAKE NOTICE that Novartis Consumer Health, Inc. will take the deposition  
19 upon oral examination of RIC International, Inc., by the person or persons designated to  
20 testify on its behalf, about the matters described in the attached Schedule A, on Wednesday,  
21 November 24, 2004, at the offices of Kirkpatrick & Lockhart, LLP, 75 State Street, Boston,  
22 Massachusetts 02109, (617) 261-3100, beginning at 10:00 a.m. Eastern Time and continuing  
23 until completed. RIC International, Inc. has identified Leonid Fridman as the 30(b)(6)  
24 deponent.  
25  
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AMENDED NOTICE OF TAKING DEPOSITION  
DUCES TECUM OF RIC INTERNATIONAL, INC. - 1  
Case No. MDL 1407  
019186.0033/1151287.1

LANE POWELL SPEARS LUBERSKY LLP  
SUITE 4100  
1420 FIFTH AVENUE  
SEATTLE, WA 98101  
(206) 223-7000

1 The deposition will be conducted pursuant to the provisions of the Federal Rules of  
2 Civil Procedure and Case Management Order No. 1 and will be stenographically recorded by  
3 the court reporting firm of Tate & Tate.

4 The call-in information is as follows: 1-800-882-3610, passcode: 6973918.  
5

6  
7 RESPECTFULLY SUBMITTED this 9 day of November, 2004.

8 LANE POWELL SPEARS LUBERSKY LLP

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10 By D. Joseph Hurson  
11 D. Joseph Hurson, WSBA No. 09296  
12 Counsel for Novartis Consumer Health, Inc.;  
13 Co-Liaison Counsel for MDL Manufacturing  
14 Defendants  
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DUCES TECUM OF RIC INTERNATIONAL, INC. - 2  
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**SCHEDULE A****Definitions**

The term "documents" is used in its broadest sense, and includes, without limitation, written material of whatever kind or nature, whether typed, printed, handwritten or otherwise produced including, without limitation, letters, memoranda, notes, contracts, bills, invoices, spreadsheets, photographs, calendars, photostats, photocopies, data, audio or video recordings, and electronic data compilations, including computerized files, computer disks, hard drives, database records, "voice mail" or "phone mail" recordings, and "electronic mail" or "e-mail" messages, however stored, as well as drafts, revisions, and redline versions or iterations, whether paper or electronic. Spreadsheets and any other documents that contain formulas and/or calculations are to be produced in readable electronic format and in such a way that the formulas and/or calculations may be reviewed.

The word "communication" when used herein shall mean any and all communications of any kind, including, without limitation, any and all conversations, discussions, inquiries, correspondence, notes (handwritten or otherwise), message slips, logs, e-mail (or other similar electronic transmission or communication), or such other transmittal of information, whether written, oral, or by any other means. The word "communication" also means internal communications.

The words "concerning," "concerns," "concern," or "concerned" shall mean relating to, referring to, regarding, describing, supporting, tending to contradict, evidencing or constituting.

The term "you," "your," and "yours" shall mean RIC International, Inc., a business entity, and any partner, officer, director, employee, representative, attorney, agent, parent,

AMENDED NOTICE OF TAKING DEPOSITION

DUCES TECUM OF RIC INTERNATIONAL, INC. - 3

Case No. MDL 1407

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1 accountant, subsidiary, affiliate, other predecessor-in-interest, or other person or entity acting  
2 on behalf of "RIC International, Inc."

3 The term "Korean Study" refers to the paper translated as "A case-control study to  
4 investigate the association between the use of combination drugs containing  
5 Phenylpropanolamine (PPA) and the risk of hemorrhagic stroke."

6 Further, the "documents" requested herein extend to and include any and all such  
7 materials within the possession, custody, or control of the experts, agents, attorneys, or  
8 representatives, regardless of where located.  
9

#### 10 Matters for Testimony

11 RIC International, Inc. shall designate one or more officers, directors, or managing  
12 agents, or other persons who consent to testify on its behalf, to testify on the following topics:  
13

- 14 1. RIC International, Inc.'s translation of the Korean Study;
- 15 2. Communications concerning the Korean Study, including, but not limited to,  
16 any instructions concerning translating the Korean Study into English and any  
17 comments on drafts of the Korean Study translation;
- 18 3. The relationship between RIC International, Inc. and the party for whom you  
19 provided the translation of the Korean Study; and
- 20 4. The Certification of Translation Accuracy dated September 1, 2004, executed  
21 by RIC International, Inc. for the Korean Study.

#### 22 Documents or Objects

23 You are to produce the materials in your possession, custody, or control listed below:

- 24 1. All complete or partial drafts of the Korean Study;
- 25 2. All communications, documents, notes or other internal communications  
26 regarding the Korean study or its translation into English reflecting  
communications concerning the Korean Study, including, but not limited  
to, any instructions, dictionaries, medical texts, articles or other materials

1 RIC International, Inc. consulted to translate the Korean Study into  
2 English and any comments on drafts of the Korean Study translation;

3 3. All contracts, work orders, invoices, bills, and any other documentation  
4 of the relationship between you and the party for whom you provided the  
5 Korean Study translation;

6 4. All time sheets or other documents reflecting the time that was spent  
7 translating the Korean Study;

8 5. All documents concerning any payment you received or are expected to  
9 receive for translating the Korean Study;

10 6. Current curriculum vitae of all translators, editors, translation managers,  
11 and all other persons that participated in translating the Korean Study;  
12 and

13 7. To the extent not already requested, all documents concerning RIC  
14 International, Inc.'s translation of the Korean study.  
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DUCES TECUM OF RIC INTERNATIONAL, INC. - 5  
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**CERTIFICATE OF SERVICE**

I, Heidi Carchano, hereby certify and declare under penalty of perjury as follows:

On the 10th day of November, 2004, I electronically filed the foregoing document with the Clerk of this Court using the CM/ECF system. In accordance with the Court's ECF registration agreement and the Court's rules, the Clerk will send e-mail notification of such filing to the CM/ECF participants in this matter.

I further certify and declare that Lane Powell Spears Lubersky LLP caused the aforementioned documents to be served upon the following:

Via Hand Delivery

Lance Palmer  
LEVINSON FRIEDMAN  
720 Third Ave, Suite 1800  
Seattle, WA 98104

Via Electronic Mail

Arthur Sherman  
SHERMAN SALKOW PETOYAN & WEBER

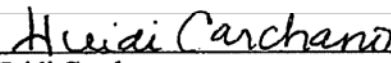
Richard S. Lewis  
COHEN MILSTEIN HAUSFELD & TOLL

H. Bissell Carey III  
ROBINSON & COLE

David L. Suggs  
LOPEZ HODES RESTAINO MILMAN & SKIKOS

All Defense Counsel

Signed and dated this 10th day of November 2004, in Seattle, Washington.

  
Heidi Carchano

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